

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DEC 29 2003

CLERK  
Deputy Clerk

RICHARD H. GILMORE, On  
behalf of Himself and All Others  
Similarly Situated,

Plaintiff,

v.

CITIGROUP, INC., SMITH  
BARNEY INC., SALOMON  
SMITH BARNEY INC.,  
SALOMON BROTHERS INC.,  
CITIFINANCIAL INC. and  
TRAVELERS GROUP INC.

Defendants.

CIVIL ACTION FILE NO.  
03-CV-3223-TWT

**JOINT MOTION FOR ENTRY OF  
CONSENT ORDER EXTENDING TIME FOR DEFENDANTS  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

The parties hereby jointly request that the Court extend the time for Defendants Citigroup, Inc., Smith Barney Inc., Salomon Smith Barney Inc., Salomon Brothers Inc., Citifinancial Inc., and Travelers Group Inc. to answer, plead, or otherwise respond to the Complaint of Plaintiff Richard H. Gilmore until ten days after the United States District Court for the District of Massachusetts

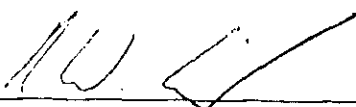
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receives the official case file from this Court. A proposed Consent Order is attached hereto as Exhibit A.

Respectfully submitted this 29<sup>th</sup> day of December, 2003.

**PARKER, HUDSON, RAINER & DOBBS LLP**

By:



G. Wayne Hillis, Jr.  
Georgia Bar No. 354090  
Aaron W. Lipson  
Georgia Bar No. 453828

1500 Marquis Two Tower  
285 Peachtree Center Avenue, N.E.  
Atlanta, Georgia 30303  
Telephone: (404) 523-5300  
Facsimile: (404) 522-8409

Of Counsel:

Seth M. Schwartz  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Four Times Square  
New York, New York 10036-6522  
(212) 735-3000

Attorneys for Defendants Citigroup, Inc., Smith  
Barney Inc., Salomon Smith Barney Inc., Salomon  
Brothers Inc., Citifinancial Inc., and Travelers  
Group Inc.

**[signatures continued on following page]**

**HOLZER HOLZER & CANNON, LLC**

By: Cory D. Holzer (by A/R of express permission)  
Cory D. Holzer  
Georgia Bar No. 364698

1117 Perimeter Center West  
Suite E-107  
Atlanta, Georgia 30338  
Telephone: (770) 392-0090  
Facsimile: (770) 392-0029

Attorney for Plaintiff Richard H. Gilmore



## EXHIBIT / ATTACHMENT

A

(To be scanned in place of tab)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**RICHARD H. GILMORE, On  
behalf of Himself and All Others  
Similarly Situated,**

**Plaintiff,**

**v.**

**CITIGROUP, INC., SMITH  
BARNEY INC., SALOMON  
SMITH BARNEY INC.,  
SALOMON BROTHERS INC.,  
CITIFINANCIAL INC. and  
TRAVELERS GROUP INC.**

**Defendants.**

**CIVIL ACTION FILE NO.  
03-CV-3223-TWT**

**CONSENT ORDER EXTENDING TIME FOR  
DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**

Before the Court is Plaintiff Richard H. Gilmore's ("Plaintiff") and Defendants Citigroup, Inc., Smith Barney Inc., Salomon Smith Barney Inc., Salomon Brothers Inc., Citifinancial Inc., and Travelers Group Inc. (collectively, "Defendants") joint motion to extend the time for Defendants to answer, plead, or otherwise respond to Plaintiff's Complaint.

The Court GRANTS said motion and hereby extends the time in which Defendants may answer, plead, or otherwise respond to Plaintiff's Complaint, until ten days after the United States District Court for the District of Massachusetts receives the official case file from this Court.

The parties' obligations with respect to *Federal Rule of Civil Procedure* 26 and Northern District of Georgia Local Rules 3.3, 16.1, 16.2 and 26.1 shall not commence until such time as Defendants answer, plead or otherwise respond to Plaintiff's Complaint in this Court.


IT IS SO ORDERED, THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 200\_\_.

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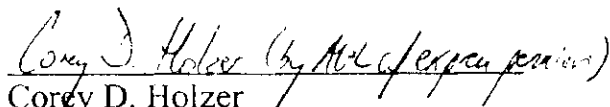
Thomas W. Thrash, Jr.  
Judge, United States District Court  
Northern District of Georgia

**[Consent signatures on following page]**

Consented to by:



G. Wayne Hillis, Jr.  
Aaron W. Lipson  
Parker, Hudson, Rainer & Dobbs LLP  
1500 Marquis Two Tower  
285 Peachtree Center Avenue, N.E.  
Atlanta, Georgia 30303  
Telephone: (404) 523-5300  
Facsimile: (404) 522-8409



Corey D. Holzer  
Holzer Holzer & Cannon, LLC  
1117 Perimeter Center West  
Suite E-107  
Atlanta, Georgia 30338  
Telephone: (770) 392-0090  
Facsimile: (770) 392-0029

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served a copy of the forgoing **JOINT MOTION FOR ENTRY OF CONSENT ORDER EXTENDING TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT** upon all parties to this matter by causing to be deposited a true copy of same in the United States mail, proper postage prepaid, addressed to counsel of record as follows:

Michael A. Collora, Esq.  
Dwyer & Collora, L.L.P.  
600 Atlantic Avenue  
Boston, Massachusetts 02210

Richard L. Coffman, Esq.  
Law Offices of Richard L. Coffman, P.C.  
550 Fannin Street, Suite 1212  
Beaumont, Texas 77701

Bruce H. Nagel, Esq.  
Nagel, Rice, Dreifuss & Mazie  
301 South Livingston Avenue  
Livingston, New Jersey 07039

Ashley D. Posner, Esq.  
Law Offices of Ashley D. Posner  
15303 Ventura Boulevard, Suite 900  
Sherman Oaks, California 91403

Corey D. Holzer, Esq.  
Holzer Holzer & Cannon, LLC  
1117 Perimeter Center West  
Suite E-107  
Atlanta, Georgia 30338

This 27<sup>th</sup> day of December, 2003.

By:

  
Aaron W. Lipson